

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

THE UNIVERSITY OF
NORTHERN VIRGINIA, INC.

Plaintiff

v.

ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND
SCHOOLS, INC.

Defendant.

Civil Action No. _____

Declaration of Mitchell R. Young

1. My name is Mitchell Young. I have served as the President of the University of Northern Virginia's (UNVA) Prague campus, located in the Czech Republic since July of 2004. I am a U.S. Citizen, I am over the age of 18, and I have personal knowledge of the facts set forth herein.
2. As President of the Prague campus, I have day-to-day management responsibilities for all educational, administrative and public relations operations of the UNVA Prague Campus. I also am responsible for the Prague Campus's compliance with all accreditation criteria and the ultimate quality of our educational programs here. I interact with prospective students and enrolled students on a regular basis and represent the University before faculty, students, prospective students, government officials, the media and the public. I am knowledgeable about all aspects of the Prague Campus and programs and the information set forth in this declaration is based upon my



intimate knowledge and experience in the field of education generally and my work at the Prague Campus of UNVA specifically.

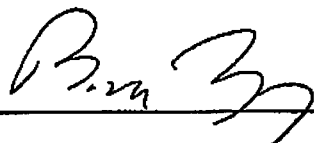
3. I hold a Masters in Religious Studies (1997) from the University of Chicago, and a Bachelors of Political Science (1994) from Williams College. Prior to joining UNVA, I served, among other roles, as Vice President of Academic Affairs of Anglo-American College (1999 to 2004) and Managing Director of Work-Plus Interstaff (1997-1998). In total, I have over 8 years of experience in the field of higher education, and over 8 years of experience in the field of international higher education.
4. UNVA's Prague Campus currently has 130 students. We offer Bachelor and Master degree programs in Business Administration. We have been growing quickly and interest by prospective students has increased significantly in the last two years. We have put significant resources into the accreditation process to be sure we meet all the criteria as stated by ACICS and have submitted all the required reports and self study. Accreditation forms the foundation on which we have built our programs, and has been a primary enabler of our growth.
5. UNVA's denial of accreditation by the Accrediting Council for Independent Schools & Colleges (ACICS) will have a noticeable and negative impact on UNVA's Prague Campus. ACICS's accreditation of UNVA is critically important to its Prague Campus. Students enroll here in order to obtain a high quality American education from an institution that is accredited in the United States. The message that denial of accreditation sends to current and potential

students is that UNVA is not of high quality, which is untrue. The damage caused by this denial to the reputation of the Prague campus is extremely high. Information about the denial will spread quickly, and it will not be possible for us to repair our reputation completely even if there were a fair and favorable resolution of the accreditation status.

6. ACICS's denial of accreditation will directly harm our ability to recruit new students. Underlying all of our recruiting efforts is the fact that we are accredited in the United States. It is extremely important to potential students that we are accredited. Right now we are entering a key recruiting season, with education exhibitions in a number of places this November. As an unaccredited school, our recruitment efforts will be severely harmed until there is a fair and favorable resolution of our accreditation status. The lack of accreditation may result in the Prague Campus losing most, or all of our new applicants and many of the 130 students we currently have.
7. The lack of accreditation will also negatively impact our current students who are in the middle of degree programs. They will not be receiving a degree from an accredited American university. As a result of this many of them may discontinue their studies. This will have profound consequences for future operations at the Prague Campus, and may result in us having to discontinue operations entirely. It is extremely unlikely that a student who leaves the school would return even if there were a fair and favorable resolution of our accreditation status. In most cases the student would be continuing their education elsewhere, and the trust and good will established between the

student and the UNVA Prague campus would have been damaged beyond repair.

I declare, under the penalty of perjury, that the foregoing is true and correct.

 10-18-2007

Mitchell R. Young